

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Special Litigation Counsel to the Liquidating Trustee

In re:

NEW ENGLAND MOTOR FREIGHT, INC., *et al.*,¹

Debtors.

Chapter 11

Case No.: 19-12809 (JKS)
(Jointly Administered)

NOTICE OF APPEARANCE OF SPECIAL LITIGATION COUNSEL

PLEASE TAKE NOTICE that, in accordance with Fed. R. Bankr. P. 9010(b), the following attorneys hereby enter an appearance in this case as special litigation counsel to Kevin P. Clancy, solely in his capacity as the Liquidating Trustee:

¹ The “**Debtors**” in these Chapter 11 Cases and the last four digits of each Debtor’s taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

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PLEASE TAKE FURTHER NOTICE that it is intended that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive the Liquidating Trustee's (1) right to have final orders in non-core matters entered only after *de novo* review by a District Court judge; (2) right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) right to have the District Court withdraw the reference of any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, remedies, setoffs, or recoupments to which it is or may be entitled under agreement, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, remedies, setoffs, and recoupments it expressly reserves.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance does not constitute an agreement to accept service of initial process under Fed R. Civ. P. 4 or Fed. R. Bankr. P. 7004,

nor shall it result in undersigned proposed counsel being deemed to be the agent of the Liquidating Trustee for such purpose.

Dated: May 7, 2021

WHITEFORD, TAYLOR & PRESTON, LLP

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